



Illinois Environmental Protection Agency

217/782-6762

Refer to: 11911501 -- Madison County
Wood River/Amoco Oil Company

MAY 16, 1984

Amoco Oil Company
200 East Randolph Drive
Chicago, Illinois 60601

Attention: John G. Huddle

Gentlemen

This will acknowledge receipt of your Application to treat sludges and sediments containing dissolved air flotation float from the petroleum refining industry (K 048), and store the treated waste in lagoon 5 of your hazardous waste impoundments, dated and received by the Agency May 27, 1983. An unconditional waiver of the 90 day rule (Chapter 7 Rule 205(g)) was dated and received by the Agency August 18, 1983 and a request for an Agency response to your various submittal was dated December 28, 1983 and received by the Agency on December 30, 1983.

Your permit application to treat and store treated sludges and sediment at your riverfront impoundments is denied.

You have failed to provide proof that granting this permit would not result in violations of the Illinois Environmental Protection Act. Section 39(a) of the Illinois Environmental Protection Act (Ill. Rev. Stat., 1979, Ch. 111 1/2, par. 1039(a)) requires the Agency to provide the applicant with specific reasons for the denial of permit. The following reason(s) are given:

1. Sufficient information has not been provided to demonstrate that disposal within a 100 year flood plain will not cause a violation of Section 12(a) and 12(b) of the Act. It must be demonstrated that the proposed site will be protected from the affects of surface water and groundwater during a 100 year flood occurrence.
2. It is the Agency's opinion that the groundwater monitoring program for lagoons 1 through 4 does not comply with the requirements of State of Illinois Rules and Regulations, Title 25, Environmental Protection, Subtitle G, Waste Disposal, Part 725, Subpart F.
 - a. A groundwater monitoring program has been proposed for pond 5 only (p. 45 and figure g of application) the Agency requires a groundwater monitoring program for lagoons 1 through 5 which will determine the level of all controlled constituents in groundwater adjoining the impoundments.
3. The Agency cannot act on assumptions as to possible favorable action by the USEPA in delisting the "chem-fixed" hazardous waste but must rely on existing regulations





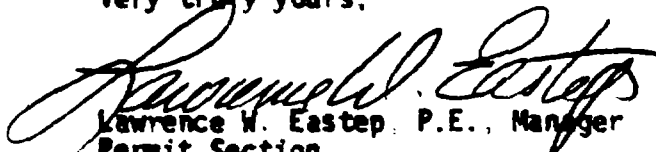
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In the event the chem-fixed waste is delisted, the resubmittal of your application should give consideration to the following:

1. Present evidence that approval has been received for changes in the RCRA Part A made for on site treatment of DAF float sludge and for on site disposal of the treated waste, as required by Subtitle G Sec. 700.105(c)(3).
2. Submit a closure plan for lagoons one through 5.
3. Provide for groundwater monitoring of the upper and lower aquifer around individual lagoons 1 through 4 in accordance with Part 725, Subpart F.
4. Furnish construction details of the proposed encapsulation of treated waste including top and bottom liner and leachate detection.

Should you have any questions regarding this denial, please contact Robert C. Mulvey at 217/782-6760.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:RCM:bv/09250/14-15

cc: Southern Region
Division File
Woodward-Clyde Consultants
E. J. Sullivan
R. C. Mulvey